

**VIA ECF**

The Honorable Arun Subramanian  
United States District Court, Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007-1312

**Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC**

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.<sup>1</sup>
- Defendants' contract reviewers have reviewed approximately 5,431,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference.
- Defendants have produced approximately 2,167,000 documents and over 55.8 billion observations of data covering 8 different countries in this litigation to date.

Pursuant to the Court's instruction at the March 13, 2025 conference, Defendants further submit the following metric regarding Defendants' ongoing privilege review workflow.

- As of today, there are zero documents in Defendants' privilege review workflow that have not yet been produced or logged.

*[signatures on following page]*

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<sup>1</sup> Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: July 3, 2025

Respectfully submitted,

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cc: All Counsel of Record (via ECF)